



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

US EPA RECORDS CENTER REGION 5



492195

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

September 3, 1997

Mr. Don Bruce  
Chief, Response Section II  
Emergency Response Branch  
U.S. Environmental Protection Agency  
77 West Jackson Street  
Chicago, IL 60604-3590

Dear Mr. Bruce,

To follow-up our telephone conversation on Wednesday, September 3, 1997, I am writing to request that the Region 5 offices of the United States Environmental Protection Agency consider the assignment of an On-Scene Coordinator to the Imperial Industries site located in Kingston, Illinois.

Attached is a June 1997, a site inspection report, prepared by Illinois EPA's Rockford Regional Office, which revealed the presence of approximately 25 drums of plating wastes. The drums have been present for at least six years. During that time, Illinois EPA's efforts to initiate a cleanup have been unsuccessful.

For this particular project, Brad Taylor (217/524-1660) will be the Illinois EPA contact person. Thank you for your consideration and we look forward to working with USEPA in these and future removal activities.

Sincerely,

Bruce Everetts  
Illinois Environmental Protection Agency  
Bureau of Land  
Remedial Project Management Section  
Site Assessment Unit

cc: Brad Taylor



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

4302 North Main Street, Rockford, IL 61103

**Date:** June 6, 1997  
**To:** Sue Doubet  
**From:** Jason Thorp - Region 1 FOS  
**Subject:** 0370250002 -- DeKalb County  
Kingston / Imperial Industries  
Superfund - Request for Remedial Investigation (FY98 \$)

**SITE DESCRIPTION:** Imperial Industries is a chrome plating facility located at Karen Drive, within a residential area, on the West side of Kingston, Illinois. Adjacent to Imperial Industries is a small creek which flows from the West to the East.

**PROJECT DESCRIPTION:** Removal Action

**PROXIMITY TO EXISTING POPULATION:** The potential exists for private residential wells within the vicinity of the site as Imperial Industries is located within a residential area.

**EVALUATION OF RISK:** The contamination potential exists for 1.) migration to groundwater 2.) surface water pathway and 2.) soil exposure pathway.

**GEOLOGY:** Soil in the area consists of a sandy till or clay, with discontinuous layers of sand, silt and gravel. The soil represents the Weldron Formation of the Wisconsinan stage of glaciation and consists of a succession of tills, generally containing minor amounts of interbedded outwash sand, gravel and Lacustrine silt and clay (Kempton, 1985). The main till members representing the Weldron Formation are the Malden, the Tiskilwa, and the Yorkville.

The Weldron Formation is underlain by the Glasford Formation of the Illinoian Stage of glaciation. Tills occurring within the Glasford Formation appear to consist of material within the Formation, with small amounts of sand and gravel outwash. In addition, lacustrine deposits of sand, silt and clay, frequently exist between the tills (Kempton, 1985).

Underlying the glacial drift is the uppermost bedrock unit consisting of the Ordovician-aged dolomite and dolomitic shale. A series of dolomitic formations, known as the Galena, Decorah, and Platteville, extend from a depth of approximately 140' bgs to approximately 470' bgs. Underlying the dolomitic formations is the Ordovician Glenwood - St. Peter Sandstone at an approximately 230' thick.

**PRIOR AGENCY INVOLVEMENT:** On October 25, 1995, the Rockford FOS received a complaint alleging that Imperial Industries was disposing of its plating waste via a septic tank. Initially, the complaint was investigated by the ISP Environmental Crimes Unit. The ISP's investigation revealed the facility too small to warrant a criminal investigation.

However, the complaint was investigated on May 16, 1995, by Mary Canterbury and Virginia Duffy. During the investigation Jim Sitzes gave a tour of his single electroplating bath operation

and showed Mary and Virginia the septic tank location. Samples were procured from the septic tank. The septic tank serves the Imperial Industries facility and four residential rental units. Samples taken from the septic tank were analyzed for VOC's, pH, and metal. The lab analysis found the samples to be free of TCLP chrome, although, trace amounts of acetone and toluene were detected.

In Addition, the investigation revealed a storage room which contained several 55-gallon drums. Mr. Sitzes stated that the drums belonged to someone else and that he could not grant access to the inspectors. During the course of numerous conversations between Mr. Sitzes and Bob Wengrow, Sitzes finally admitted that the stored drums belonged to him and granted the IEPA access to the storage area.

On August 22, 1995, Mary Canterbury and Tom Walsh returned to Imperial Industries as part of a follow-up inspection to determine the contents of the drums in the storage area. The follow-up inspection revealed that approximately twenty drums of used plating solutions and plating chemicals have been in existence for approximately one to six years without a permit. Tom Walsh also found that the existing plating vat was in need of a operating permit from DAPC.

Subsequently, Imperial Industries received a September 8, 1995, PECL, citing the violation of 722.111 for failure to adequately identify the stored chemicals. On September 28, 1995, a PEC meeting was held between Mr. Sitzes, Mary Canterbury, Tom Walsh and Bob Wengrow. During this meeting Tom Walsh informed Mr. Sitzes of the permitting requirements of the chrome plating line. In addition, Mary Canterbury and Bob Wengrow explained that unless Mr. Sitzes could demonstrate that the stored chemicals would never be put to use, the chemicals are considered hazardous. Mr Sitzes explained that Imperial Industries did not have the funding to set up additional plating lines nor the money to properly dispose of the stored chemicals as a hazardous waste.

Mary Canterbury contacted Mr. Sitzes on October 31, 1995, to ascertain whether or not he had set up additional plating lines or shipped the stored chemicals off-site as a hazardous waste. Mr. Sitzes replied in the same manner as at the September 28, 1995, PEC meeting.

On December 6, 1995, Mary Canterbury telephoned Mr. Sitzes in the hopes of setting up a time which the Agency would be able to procure samples of the stored chemicals. Her request received very little cooperation. Mr. Sitzes stated that access to the chemicals for the purposes of sampling would be granted if the following conditions were met:

- 1.) Mr. Sitzes requested a letter from the Agency stating that no chrome was found in his septic tank; and,
- 2.) that Imperial Industries had been exonerated from the charges alleged in the October 25, 1995, complaint.

On December 6, 1995, a copy of the analytical results from the septic tank sampling were mailed to Mr. Sitzes, with a cover letter stating no TCLP chrome had been detected. However, Mr. Sitzes felt the cover letter to be inadequate as it did not contain the exoneration from the accusations within the complaint.

The Rockford FOS requested that a search warrant be issued for the purpose of sampling the

stored chemicals. If the analytical results indicated that the stored chemicals were indeed hazardous, Imperial Industries in turn would be cited for closure of an unpermitted hazardous waste storage facility. The following table summarizes the results of the samples taken on July 16, 1996:

| Summarization of samples taken on July 16, 1996 at Imperial Industries |                  |                          |                                    |
|--|------------------|--------------------------|------------------------------------|
| Sample #   | Approx. Quantity | Alleged Contents         | Waste Codes                        |
| X201   | 56 gal.          | Chrome Plating Solution  | D002, D006, D007, D008, D010, D011 |
| X202   | 30 gal.          | Chrome Plating Solution  | D002, D006, D007, D010             |
| X203   | 36 gal.          | Chrome Plating Solution  | D002, D007, D010, D011             |
| X206   | 200 lbs.         | Potassium Cyanide Powder | P098                               |
| X207   | 270 lbs.         | Copper Cyanide Powder    | P029                               |
| X211   | 50 gal.          | Chrome Plating Solution  | D002, D007, D008                   |
| X212   | 55 gal.          | Bright Acid Tin          | D002                               |

\*note: 1.)The alleged contents column is based on container labels and information provided by Mr. Sitzes  
2.)Waste Code column is based on the lab analysis.

In addition to the materials tabulated above, which were sampled and confirmed to be hazardous, the flowing materials were also in storage but were not sampled:

- 4 drums used copper plating solution
- 2 drums used nickel plating solution
- 2 drums satin tin
- 1 drum bright acid tin
- 2 drums cyanide powder
- 3 drums chrome plating solution
- 1 drum floor sweepings

The above referenced chemicals have been in storage for at least one year and possibly up to a period of six years. Currently, Imperial Industries has not obtained nor applied for a RCRA permit to store hazardous waste. A VN has been sent to Mr. Sitzes via Springfield Headquarters, however, the current status is unknown.

**VIABLE PRP'S:** Mr. Sitzes, the owner, would be considered the PRP, however, due to his repeated claims of being financially incapable of disposing of the stored hazardous waste this may be a good candidate for a state funded project.

**MAGNITUDE OF SOURCE:** The magnitude of the source consists of approximately 25 drums.

**ESTIMATE OF WORK:** Remedial activities, at a minimum, would consist of a thorough inventory and characterization of waste drums on-site and proper disposal of such waste.

**ESTIMATE OF COST:** unknown

**EXPECTED BENEFITS:** Currently, contamination and potential exposure pathways exist at the site. The cleaning of the on-site wastes would assure that the waste would not end up being a future liability in an environment in which it may be difficult to recover.